

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
2 Charles K. Verhoeven (Bar No. 170151)
3 charlesverhoeven@quinnemanuel.com
4 Melissa Baily (Bar No. 237649)
5 melissabaily@quinnemanuel.com
6 Lindsay Cooper (Bar No. 287125)
7 lindsaycooper@quinnemanuel.com
50 California Street, 22nd Floor
8 San Francisco, California 94111-4788
9 Telephone: (415) 875-6600
10 Facsimile: (415) 875-6700

11 *Attorneys for Google LLC*

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

11 GOOGLE LLC,
12 Plaintiff,
13 vs.
14 SONOS, INC.,
15 Defendant.

CASE NO. 3:20-cv-06754-WHA
Related to CASE NO. 3:21-cv-07559-WHA
**DECLARATION OF NIMA HEFAZI IN
SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF ITS REPLY IN SUPPORT
OF ITS MOTION FOR SUMMARY
JUDGMENT PURSUANT TO THE
COURT'S PATENT SHOWDOWN
PROCEDURE**

1 I, Nima Hefazi, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am of counsel at Quinn Emanuel Urquhart & Sullivan LLP representing
 4 Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this
 5 Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Google’s Administrative Motion to File Under
 7 Seal Portions of its Reply in Support of its Motion for Summary Judgment Pursuant to the Court’s
 8 Patent Showdown Procedure (“Reply”). If called as a witness, I could and would testify competently
 9 to the information contained herein.

10 3. Google seeks an order sealing the materials as listed below:

11 Document	12 Portions to Be Filed Under Seal	13 Designating Party
12 Google’s Reply	13 Portions highlighted in yellow	14 Google
14 Exhibit 1 to Declaration of Nima Hefazi in Support of Google’s Reply (“Hefazi Decl.”)	15 Portions highlighted in yellow	16 Google
16 Exhibit 2 to Hefazi Decl.	17 Entire Document	18 Google
17 Exhibit 3 to Hefazi Decl.	18 Entire Document	19 Google
18 Exhibit 4 to Hefazi Decl.	19 Entire Document	20 Google
20 Exhibit 7 to Hefazi Decl.	21 Entire Document	22 Google

22 4. Portions of Google’s Reply and Exhibit 1 as well as Exhibits 2, 3, 4, and 7 contain
 23 references to Google’s confidential business information and trade secrets, including details regarding
 24 source code, architecture, and technical operation of Google’s products and functionalities that Sonos
 25 accuses of infringement. The specifics of how these functionalities operate is confidential information
 26 that Google does not share publicly. Thus, public disclosure of such information could lead to
 27 competitive harm to Google as competitors could use these details regarding the architecture and
 28 functionality of Google’s products to gain a competitive advantage in the marketplace with respect to

1 their competing products. I also understand that a less restrictive alternative than sealing these
2 documents would not be sufficient because the information sought to be sealed is Google's
3 confidential business information and trade secrets but is necessary to Google's Reply.

4 I declare under penalty of perjury under the laws of the United States of America that to the
5 best of my knowledge the foregoing is true and correct. Executed on May 19, 2022, in Los Angeles,
6 California.

7 DATED: May 19, 2022

8 By: /s/ Nima Hefazi
9 Nima Hefazi

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1 **ATTESTATION**

2 I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the
3 above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Nima Hefazi has concurred
4 in the aforementioned filing.

5
6 DATED: May 19, 2022

7 */s/ Charles K. Verhoeven*

8 Charles K. Verhoeven

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